

Managing the risk of sexual harassment and sex or gender-based harassment at work

Prevention plan template

All persons conducting a business or undertaking (PCBUs) **must** prepare and implement a **prevention plan** to manage identified risks of sexual harassment and sex or gender-based harassment in the workplace. PCBUs have a duty to prevent sexual harassment and sex or gender-based harassment from occurring, not only to respond to incidents that have already occurred.

The prevention plan must focus on managing identified risks to the health and safety of workers, or other persons, in the workplace. PCBUs must ensure that the plan complies with the requirements in section 55H of the [Work Health and Safety Regulation 2011 \(WHS Regulation\)](#).

The risk management process is set out in the [Managing the risk of psychosocial hazards at work Code of Practice 2022](#) (the Code) and involves:

- **identifying the risk of sexual harassment and sex or gender-based harassment** – find out what could cause harm
- **assessing risks** – understand the nature of the harm, how serious the harm could be and the likelihood of harm occurring
- **controlling risks** – implement the most effective control measures that are reasonably practicable in the circumstance
- **reviewing control measures** – to ensure they remain effective.

All of these steps must be supported by consultation. The prevention plan must be communicated to workers.

This document provides PCBUs with a template that can be used to satisfy the requirements under the WHS Regulation to develop and implement a prevention plan. The template is not mandatory but exists as a tool for PCBUs who may need support in preparing a prevention plan.

WORKPLACE:

AUTHOR:

DATE:

DATE OF NEXT REVIEW:

Consultation

Sections 46, 47, 48 and 49 of the *Work Health and Safety Act 2011* (WHS Act) and section 55H(2)(e) of the WHS Regulation 2011

REQUIREMENT

PCBUs **must** consult with workers and others as part of the development of a prevention plan.

CONSIDERATIONS

- Have you consulted with your workers?
- How did you consult with your workers?
- Have you included other parties as part of your consultation process (for example, unions, representatives, shared duty holders)?
- Have you protected your workers' privacy and anonymity, where possible?
- Are you using consultation as an opportunity for improvement?

ACTIONS TAKEN

Characteristics of workers and the workplace

Sections 46, 47, 48 and 49 of the WHS Act 2011 and section 55H(2)(e) of the WHS Regulation 2011

REQUIREMENT



CONSIDERATIONS



ACTIONS TAKEN



PCBUs **must** have regard to the characteristics of workers, the workplace and the work environment when assessing, identifying, and controlling the risks for sexual harassment and sex or gender-based harassment.

- What are the characteristics of your workers?
For example, number of workers, gender, age of workers, employment status (casual, part-time), isolated workers, LGBTIQ+, diversity of workers, etc.
- What are the characteristics of your workplace and/or work environment?
- Do direct observations of the workplace indicate any risks?

Our workers consist:

- Gender diverse (Men-8, Women -15, Trans/non-binary/other- 4)
- 5 Aboriginal workers
- 1 Casual worker
- 9 Part-time workers
- 17 Full-time workers
- Range in age from 25 yrs- 75 yrs
- 2 Contractors engaged in 2025 providing creative activities to students.
- University and TAFE placement students

Board consists of 4 volunteers.

- 2 men, 2 women
- Age range mid 30-70 yrs
- 1 Retired
- 3 self employed

Students consist of:

- 15-19 year olds
- Approximately 40% First Nations
- Approximately 30% Queer (Gender diverse).

Leadership team comprises:

2 Co-Principals, Business Manager (HRS), Head of Curriculum & Learning, Support Services Coordinator and Family Liason Worker, this teams meets fortnightly in a collaborative approach to leading the school.

WHS Team consisting of HRS and members from each team at JCC meet monthly to identify hazards and put in control measures.

Staff meetings are held fortnightly and staff training is held weekly.

Characteristics of workers and the workplace

Sections 46, 47, 48 and 49 of the WHS Act 2011 and section 55H(2)(e) of the WHS Regulation 2011

REQUIREMENT



CONSIDERATIONS



ACTIONS TAKEN



Continued

- Continued

- Staff are passionate about creating inclusivity and cultural awareness amongst both staff and students.

- 2 culturally safe spaces available (Queer and First Nations)

- All spaces have been designed with high visibility.

- Staff and students provided with lockers

- Staff have a retreat room for breaks and meetings.

- 2 staff bathrooms located next to student bathroom

- All bathrooms are gender neutral

- All office/staff and classroom spaces can be locked.

- Work culture is thoughtful and caring.

Identification of other risks and psychosocial hazards

Sections 55D(2), 55F, 55H(1) and 55H(2)(b) of the WHS Regulation 2011

REQUIREMENT



PCBUs **must** identify and assess any other risks and psychosocial hazards.

CONSIDERATIONS



- Have risks been identified in the workplace?
- How long are workers and others exposed to the risk and hazards?
- How often are workers and others exposed?
- How does exposure to the risk or hazard affect workers (for example, distress, stress, physical safety)?
- How does the hazard interact with or combine with other hazards?
- Have you consulted with workers to assess risks?
- Is there data to assess the risks?

ACTIONS TAKEN



At JCC, harassment—whether intentional or unintentional—may be caused by a range of individuals including:

Students

Colleagues

Contractors

Delivery personnel

Support workers

Volunteers

Placement students

Precinct staff & competitors and their family members

Students' families

Community members

Other occasional visitors

Harassment may occur both during and outside of standard JCC operating hours.

Identified Causes and Considerations

Following staff consultation through workshops, discussions, and written feedback, the following risk factors have been identified:

Identification of other risks and psychosocial hazards

Sections 55D(2), 55F, 55H(1) and 55H(2)(b) of the WHS Regulation 2011

REQUIREMENT



CONSIDERATIONS



ACTIONS TAKEN



Continued

Continued

Single or repeated incidents of harassment based on race, religion, gender, sex, age, disability, or other protected attributes.

Misunderstandings or lack of cultural awareness by staff or students, potentially leading to unintentional harm or offense.

Clothing worn by staff or students displaying offensive or child-inappropriate images or language.

Access or display of explicit or highly sexualised content—whether online, in printed media, or as artwork—created or shared by staff or students.

DemEANING or dismissive comments towards staff or students based on male identity, resulting in reduced support or inclusion.

Gendered assumptions or comments about competence in completing work tasks, which may result in humiliation.

Overly personal or appearance-focused compliments, which may cause discomfort or offense.

Reporting and Response Procedures
JCC's policies and procedures classify sexual harassment and sexual assault as critical incidents. While gendered assumptions, microaggressions, or unconscious bias may contribute to a hostile environment, on their own, they do not meet the threshold for harassment.

Identification of other risks and psychosocial hazards

Sections 55D(2), 55F, 55H(1) and 55H(2)(b) of the WHS Regulation 2011

REQUIREMENT 	CONSIDERATIONS  	ACTIONS TAKEN  
Continued	Continued	<p>Incidents are to be reported via the Sentral system or through the school's complaints process, accessible on the school website and through staff and student portals. All critical incidents are also reported to the CLL Board for monitoring and review.</p> <p>Management Response and Risk Mitigation Management is required to respond to these risks immediately to limit potential exposure and reduce the likelihood of harassment. Recognising and addressing these risks is essential, as they may result in serious outcomes, including lost time injuries.</p>

Control risks

Section 17 of the WHS Act 2011 and sections 55D(2), 55F(1), 55H(2)(c) and 55H(2)(d) of the WHS Regulation 2011

REQUIREMENT



PCBUs **must** implement control measures in accordance with the hierarchy of controls, aiming to eliminate then minimise the risk of sexual harassment.

CONSIDERATIONS



- What control measures have been implemented, or will be implemented, to manage each identified risk?
- Consider control measures based on the workers, workplace and work environment.
- How will control measures be recorded and reviewed to ensure that they are, and that they remain, effective?

ACTIONS TAKEN



1. Education and Awareness

Mandatory staff induction training includes respectful workplace behaviour, anti-discrimination, and cultural safety.

Annual student workshops on respectful relationships, consent, and acceptable behaviour.

Cultural competence training for all staff, including understanding of gender identity, religion, and neurodiversity.

2. Policy Enforcement

Clear Code of Conduct outlining expectations for all members of the JCC community (staff, students, contractors, etc.).

Dress guidelines for staff and students to be implemented to prevent offensive or inappropriate clothing.

ICT and Media Use Policy restricting access to explicit material and outlining disciplinary action for violations.

3. Environmental and Administrative Controls

Visible signage throughout the school promoting respect, inclusion, and how to report concerns.

Content review processes for any displays, artwork, or classroom materials to ensure child and context appropriateness.

Supervision plans during school hours and extracurricular activities to monitor behaviour.

Control risks

Section 17 of the WHS Act 2011 and sections 55D(2), 55F(1), 55H(2)(c) and 55H(2)(d) of the WHS Regulation 2011

REQUIREMENT



CONSIDERATIONS



ACTIONS TAKEN



Continued

Continued

Regular policy review cycles (e.g. bi-annually) to reflect legislative changes and emerging risks.

4. Reporting and Response Systems

Sentral incident reporting system available for both staff and students, with clear instructions on use.

Complaints handling process accessible via the school website and portals, ensuring confidentiality and prompt action.

Escalation to the CLL Board for any critical incidents involving sexual harassment or assault.

Anonymous reporting channel for sensitive disclosures, encouraging early intervention.

5. Corrective Actions and Follow-up

Immediate investigation of all reported incidents with a trauma-informed and impartial approach.

Restorative practices facilitated by trained staff to address minor breaches and repair relationships.

Disciplinary measures, including formal warnings, suspensions, or termination, depending on severity.

Support services such as counselling or referral to external providers for affected individuals.

6. Monitoring and Continuous Improvement

Quarterly review of incident data to identify trends or repeat risks.

Control risks

Section 17 of the WHS Act 2011 and sections 55D(2), 55F(1), 55H(2)(c) and 55H(2)(d) of the WHS Regulation 2011

REQUIREMENT



CONSIDERATIONS



ACTIONS TAKEN



Continued

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Staff and student feedback surveys to evaluate culture and effectiveness of control measures.

WHS committee oversight, including gender and cultural safety sub-groups to inform improvement plans.

Reporting

Part 5, Divisions 5 and 7A of the WHS Act 2011 and section 55H(2)(f) of the WHS Regulation 2011

REQUIREMENT



The prevention plan must detail the procedures for dealing with reports of sexual harassment and sex or gender-based harassment at work, including:

- how a person may make a report
- how the report will be investigated
- that the person who made the report may be represented by a health and safety representative
- how the person who made the report and other parties will be informed of the result of the investigation
- that the person who made the report may also use the issue resolution procedures and the dispute resolution process in part 5, divisions 5 and 7A of the WHS Act.

CONSIDERATIONS



- What are the procedures for dealing with reports?
- Consider the following in developing procedures:
 - ensure clear and well-communicated reporting processes
 - offer multiple formal and informal reporting pathways, where available
 - educate workers on external reporting pathways
 - offer anonymous reporting options and manage confidentiality
 - provide accessible support systems for affected persons
 - provide training and support for workers handling reports
 - communicate timeframes and decision points to parties
 - ensure fairness and impartiality in investigations
 - review report-handling procedures to assess effectiveness.

ACTIONS TAKEN



Communicate and implement

Sections 55H(3) and 55H(4)(a) of the WHS Regulation 2011 (maximum penalty—60 penalty units)

REQUIREMENT



The prevention plan **must** be implemented. Reasonable steps **must** be undertaken to ensure workers are aware of the prevention plan and how to access it.

CONSIDERATIONS



- How has the prevention plan been implemented?
- Is the prevention plan set out and expressed in a way that is readable, accessible and understandable to workers?
- What reasonable steps have been taken to ensure workers are aware of the prevention plan and how to access it (for example, communicated plan clearly and consulted with workers during implementation)?

ACTIONS TAKEN



Reviewing the prevention plan and control measures

Sections 55G and 55H(4)(b) of the WHS Regulations 2011 (maximum penalty—60 penalty units)

REQUIREMENT



CONSIDERATIONS



ACTIONS TAKEN



The prevention plan must be reviewed:

- if a report is made—as soon as practicable after the report is made
- if a health and safety committee or a health and safety representative requests a review of the plan—as soon as practicable after the request is made
- otherwise—every three years.

How will the prevention plan be reviewed and evaluated?

- review controls during workplace changes, when the controls become ineffective or after serious incidents
- review controls when new hazards are identified, a health and safety representative requests a review or on agreed review dates
- evaluate controls after serious incidents, injuries or psychological harm have occurred
- assign responsibility for reviewing controls
- record evaluation processes with documentation (for example, feedback, reports, consultation notes).